



**Operating Permits Group (MD-12)**  
Information Transfer and Program Integration Div.  
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U. S. Environmental Protection Agency  
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## FAX TRANSMISSION

Date: 4-30-96

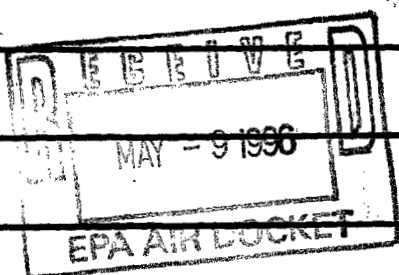
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**COMMENTS:**

Number of Pages (including cover sheet): 3

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New Paragraph that would precede the first preamble discussion of cost figures (in the EO 12866 section, p. 117)

The EPA has estimated the annualized cost of the part 71 program based on the number of sources that would be subject to part 71 permitting requirements in the 8 States where EPA believes the program will be implemented. A survey of these States showed that the number of part 71 sources in those States (many of which are not heavily industrialized) is much smaller than EPA's original estimates. The EPA had previously assumed that part 71 sources in 8 States would comprise 16 percent of all part 71 sources. However, in the States where EPA is likely to administer a part 71 program, the part 71 source population comprises slightly less than 6% of all part 71 sources.

There would be a new sentence on p. 120 in the PRA discussion to reiterate the changed assumption re: number of sources. (attached)

The EPA has estimated the annualized costs based on the number of sources that would be subject to part 71 permitting requirements in the 8 States where EPA believes the program will be implemented, most of which have fewer than the average number of part 71 sources per State.

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owners or operators of sources subject to the program to submit a timely and complete permit application and under §§ 71.6(a) and (c) which require that permits include requirements related to recordkeeping and reporting. As provided in 42 U.S.C. 7661b(e), sources may assert a business confidentiality claim for the information collected under section 114(c) of the Act.

The annual average burden on sources for the collection of information is approximately ~~2.6 million~~ <sup>677,719</sup> hours per year, or ~~474~~ <sup>329</sup> hours per source. The annual cost for the collection of information to respondents is ~~\$48.3 million~~ <sup>18.1</sup> per year, ~~assuming the part 71 program is in effect in 8 States~~. There is no burden for State and local agencies. The annual cost to the Federal government is ~~\$52.8 million~~ <sup>19.8</sup> (assuming part 71 programs are delegated), which is recovered from sources through permit fees. Thus, the total annual cost to sources would be ~~\$101 million~~ <sup>37.9</sup>.

Burden means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to a collection of information;